

Tetra Tech Anomalous Samples Incident Summary

In October 2012, the Navy Radiological Affairs Support Office (RASO) identified a discrepancy soil data sample results collected by Tetra Tech (TT). These anomalous samples had atypically low concentrations of K-40, Ra-226, Pb-214, and Cs-137. RASO thought the samples may have been collected from different locations than the ones specified in a draft FSS Report. The samples had been tested by the on-site lab and Test America so they knew it couldn't be a lab error. This led to the Navy to review soil samples collected by TT from 2008 to 2012 (over 70,000 results).

Using low K-40 criteria, RASO was able to compare soil samples that had been collected and determine if they were from the same area. They identified samples from 12 Survey Units (SUs) that had a high potential for being collected from different locations and another 7 other SUs that had a potential. They evaluated all samples from the 12 SUs and 4 of the 7 SUs and determined all were from different locations. Therefore, 16 SUs were re-sampled by TT with Navy oversight. Re-sampling revealed ROCs above the release criterion in some locations and they were subsequently remediated. All of the samples in question were originally collected in 2011 and 2012. It was determined that samples collected were disposed of and substituted with soil collected from other areas. It is not clear why this was done, though the regulatory agencies have considered that it may have been to expedite the remediation by reducing the amount of soil to be excavated.

In April 2014, TT submitted a report to the Navy which it provided to the regulatory agencies. The report is titled Investigation Conclusion Anomalous Soil Samples at Hunters Point Naval Shipyard Revision 1, April 2014. The report discusses the discovery of the anomalous samples, the resampling and subsequent remediation, as well as the disciplining and retraining of technical staff and supervisors that had been involved in the incident. Additionally, quality control protocols were put in place to prevent future incidents. Upon review of the document all regulatory agencies under the FFA determined that no further action regarding the incident was necessary.

In March 2016, a former technician (FT) for TT was interviewed at the Hunters Point Site by NBC news. FT was named in the anomalous sample report as having falsified samples. In the interview, FT provided new accusations of wrong doing by TT staff. On June 29, 2016, FT attended a site walk at Hunters Point with the Navy and federal investigators to answer questions and provide further information on these new accusations.

The Navy and the regulatory agencies have been in communication since then and the Navy was preparing a document to present to the regulatory agencies that would address all of our concerns surrounding the new allegations. The U.S. EPA and DTSC have requested that the Navy collect soil samples from two locations that FT indicated samples were falsified during his site walk (Parcel G and UC-2). The U.S. EPA has indicated that they may request additional soil sampling in other locations. In the recent Navy/regulatory agency monthly meeting the Navy indicated that they will have a contractor review the accusations and all pertinent information and make a determination if additional soil sampling is needed. U.S. EPA and DTSC are discussing if a formal letter should be submitted to the Navy to formally request additional sampling and analysis.